



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

January 4, 2022

Frederik Mohammed, Jr., Principle
& Proposed Radiation Safety Officer
NXG Testing & Consultants LLC
P.O. Box 2354
Frederiksted, VI 00841

SUBJECT: NXG TESTING & CONSULTANTS LLC, REQUEST FOR ADDITIONAL
INFORMATION, MAIL CONTROL NO. 629589

Dear Mr. Mohammed:

This is in reference to your application dated December 18, 2021, requesting a new NRC License. Please note several items below reference NUREG-1556, Volume 1, Revision 2, which can be found online at: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/index.html>. In order to continue our review, we need the following additional information:

1. Please note that the standard authorization for the Troxler models that you have requested include the entirety of the Troxler Model 3400 series. In accordance with the telephonic conversation on January 4, 2022, you requested an increased in your proposed authorization to three (3) gauges of this same type to allow for exchanges, expansion, and operational flexibility without a further license amendment. No response is necessary for this item.
2. Your application provided a commitment for gauge users to complete the Troxler Gauge Safety Training Class. Please note that your commitments in this application will become legally binding once the license is issued, and it is generally not recommended to commit to a single commercial provider. Please commit to the generalized language from NUREG-1556, Volume 1, Revision 2, Section 8.7.2, reproduced below:

Before using licensed materials, authorized users will have successfully completed one of the training courses described under "Criteria" in the section titled "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG-1556 Volume 1, Revision 2, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses.'

3. Your application under Section 9 "Facilities and Equipment" stated that the "nuclear gauges will be stored under **lock and key**..." (emphasis added). Please note that, in accordance with Title 10 of the *Code of Federal Regulations* 30.34(i) "Security Requirements for Portable Gauges," licensees are required to use a minimum of two independent physical controls that form tangible barriers to secure portable gauges whenever portable gauges are not under the control and constant surveillance of the licensee. No response is necessary for this item.

4. Your application's checklist under Section 10.8 did not provide any maintenance commitments, but rather committed to a model leak test program. Furthermore, your radiation protection program's description did not specify the manufacturer must be licensed by the NRC or an Agreement State to perform nonroutine maintenance. In accordance with the telephonic conversation on January 4, 2022, you confirmed you do not need the authorization to perform leak test analysis. In addition, in accordance with NUREG-1556, Volume 1, Revision 2, Section 8.10.8, please commit to the following:

The gauge manufacturer, or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.

We will continue our review upon receipt of this information. Please reply to my attention at:

Jason vonEhr
Mail Control No. 629589
USNRC, Region I
Division of Radiological Safety and Security
2100 Renaissance Boulevard
King of Prussia, PA 19406

Or

R1DRSSMail.Resource@nrc.gov

Reference – Jason vonEhr

Mail Control No. 629589

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5256 or via electronic mail at Jason.vonEhr@nrc.gov.

Thank you for your cooperation.

Sincerely,

Jason vonEhr, Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

License No. 55-35662-01
Docket No. 030-39298
Mail Control No. 629589

NXG TESTING & CONSULTANTS LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 629589 DATED JANUARY 4, 2022

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SUNSI Review Complete: JEV1

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NAME	Jason vonEhr						
DATE	01/04/2022						

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